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6 **UNITED STATE DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8  
9 U.S. BANK, N.A., SUCCESSOR  
10 TRUSTEE TO BANK OF AMERICA,  
N.A., SUCCESSOR IN INTEREST TO  
11 LASALLE BANK N.A., ON BEHALF  
OF THE REGISTERED HOLDERS OF  
12 BEAR STEARNS ASSET BACKED  
SECURITIES I LLC, ASSET-  
BACKED CERTIFICATES, SERIES  
13 2005-HE6,

14 Plaintiff,

15 vs.

16 TERRAFIRMA VENTURE LLC, a  
17 Nevada corporation; TREASURERS  
LANDSCAPE MAINTENANCE  
ASSOCIATION, a Nevada non-profit  
18 corporation;

19 Defendants.

20 Case No.: 2:17-cv-01890-JCP-NJK

21  
22 **STIPULATION AND ORDER TO  
EXTEND TIME FOR TERRAFIRMA  
VENTURE LLC AND DEFENDANT  
TREASURES LANDSCAPE  
MAINTENANCE ASSOCIATION TO  
RESPOND TO U.S. BANK'S  
OPPOSITION TO MOTION TO  
DISMISS [DKT. 30]**

23 **(FIRST REQUEST)**

24 In this matter, Defendant, TERRAFIRMA VENTURE, LLC ("TERRAFIRMA") filed a  
25 Motion to Dismiss on November 27, 2017 (Dkt. 19) and Plaintiff filed its Opposition to this  
26 motion on January 4, 2018 (Dkt. 30). Defendant TREASURES LANDSCAPE  
27 MAINTENANCE ASSOCIATION ("TREASURES") filed a Motion to Dismiss or, in the  
Alternative, Motion for Summary Judgment on November 27, 2017 (Dkt. 18) and Plaintiff  
filed its Opposition to this motion on January 4, 2018 (Dkt. 31). January 11, 2017 is the current  
deadline for TERRAFIRMA and TREASURES to respond to Plaintiff's Oppositions.

28 Based on conflicting deadlines in other matters as well as the numerous arguments raised

1 in Plaintiff's Oppositions, TERRAFIRMA and TREASURES need additional time to fully  
2 respond. Therefore, Plaintiff, TREASURES and TERRAFIRMA stipulate and agree that  
3 TERRAFIRMA and TREASURES have up to and including January 28, 2018 to file responses  
4 to Plaintiff's Oppositions. The parties submit this stipulation in good faith and not for purposes  
5 of delay.

6 DATED this 11<sup>th</sup> day of January, 2018. DATED this 11<sup>th</sup> day of January, 2018.

7 LIPSON, NEILSON, COLE, SELTZER & BALLARD SPAHR LLP  
8 GARIN, P.C.

9 /s/ Lisa J. Zastrow, Esq.

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11 Kaleb D. Anderson, Esq.  
12 Nevada Bar No. 7582  
13 Lisa J. Zastrow, Esq.  
14 Nevada Bar No. 9272  
15 9900 Covington Cross Drive, Ste. 120  
16 Las Vegas, Nevada 89144  
17 Attorney for *Defendant, Treasures*  
18 *Landscape Maintenance Association*

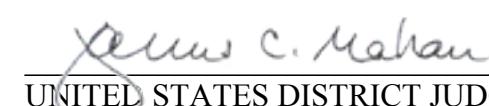
19 DATED this 11<sup>th</sup> day of January, 2018.

20 THE BALL LAW GROUP LLC

21 /s/ Zachary T. Ball, Esq.

22 \_\_\_\_\_  
23 Zachary T. Ball, Esq., SBN 8364  
24 3455 Cliff Shadows Pkwy., Ste. 150  
25 Las Vegas, Nevada 89129  
26 Attorney for *Terrafirma Venture LLC*

27 IT IS SO ORDERED.  
28

29   
30 UNITED STATES DISTRICT JUDGE

31 DATED this: January 11, 2018